

Appendix A

Public Comments received during the 30-day Public Comment Period on the Draft SEA for Disposition of the Existing VAMC

The official 25-day public comment period began on 30 December 2010 when the Draft SEA was made available to the public through the project website and by hard-copy request. A public meeting was held on 10 January 2011 at First Presbyterian Church of New Orleans, Annex in New Orleans to summarize the analysis presented in the Draft SEA and to allow the public to provide comment. Additionally, the public had the opportunity to submit comments or questions via email, mail, or in person through 24 January 2011. All comments were reviewed and those pertinent to the Disposition SEA are summarized below. Every attempt has been made to adequately respond to these comments and incorporate them into the final Disposition SEA. A total of 50 comments were received from 6 individuals during the public comment period.

Future Uses

Approximately 28 % of comments addressed possible future uses of the property including:

- Use as housing for homeless veterans.
- Use as VA Regional Office because parking at the current Regional Office is inadequate and more parking is available at the existing VAMC.
- BioDistrict/Greater New Orleans Biosciences Economic Development District (GNOBEDD) programmatic requirements – use both the existing VAMC and Charity to fulfill the BioDistrict needs (labs, offices, etc.) rather than expanding further into residential areas.
- Reusing the buildings would be consistent with UNOP including rebuilding and expanding the medical facilities in this part of the CBD.
- Transfer the VAMC to the State of Louisiana for use in association with the reopening of Charity Hospital.
- After addressing environmental concerns, convert the VAMC into apartments for LSU/Tulane medical and LSU/Charity nursing students and for staff and personnel working at LSU and Tulane medical schools.
- It would be prohibitively expensive to tear the facility down and rebuild. It would be cheaper to revitalize it in some way.
- Suggest City host adaptive reuse/consultation process similar to what State is doing for Charity Hospital to give public a stake in the outcome, to anticipate potential problems, and to devise re-use options. Adaptive reuse process would

also help ensure the property does not add to the blighted public properties that remain an issue in the city.

RESPONSE:

VA appreciates the suggestions for possible future re-uses of the property and has shared these comments with the City of New Orleans. VA encourages City's consideration of an adaptive reuse planning process.

Cumulative Impacts

Approximately 18 % of comments addressed the cumulative impacts analysis including:

- Cumulative Impacts are not explained.
- Full cumulative impacts of all surrounding areas have not been sufficiently studied.
- As new information emerges it is not included in the discussion of cumulative impacts.
- Concerns that cumulative impacts associated with transportation, hazardous waste, drainage, and noise impacts not thoroughly evaluated.
- The tiering process has allowed and even promoted some cumulative impacts to fall through the cracks.
- The proposed controversial jail expansion should be considered in the cumulative impacts.
- The BioDistrict/GNOBEDD's recently released plan alternatives should be included in the cumulative impacts.
- Both UNOP and the Master Plan propose removing the I-10 expressway. To say the results of feasibility and impact studies are necessary before including cumulative impacts is backward and erroneous. Resulting traffic patterns should be explored now and incorporated into this SEA.
- The cumulative impact of traffic and parking has not been sufficiently studied or included. Goody Clancy's "UMC Peer Review Assessment" discusses UMC parking and demonstrates that there is not adequate information.
- The recent approval of the Loyola streetcar line was not adequately addressed in the PEA. Because this line will be within the immediate vicinity of the VAMC Perdido campus, access to this new transportation feature should be evaluated.
- Not only should the impact of construction of the UMC be fully explored, but also the very real possibility that the state will not obtain funding to begin construction on schedule. The State may clear the land and elevate the property then leave the 37 acre property idle for years causing potential drainage issues.

RESPONSE:

The cumulative impacts section (Section 4.0) has been reviewed and updated. The BioDistrict/GNOBEDD alternatives are still in the process of development. Proposed

ideas for inclusion in these alternatives have been published on the BioDistrict website. Information about the current status of the BioDistrict alternatives development has been included in Section 4.4.

Design plans for the Orleans Parish Prison Complex are still in process, however, what information is available has been included in Section 4.5. Information on the new Loyala streetcar and proposed RTA changes has been included in Section 4.7.

Although the City's Master Plan calls for a study regarding the removal of the elevated I-10 along Claiborne Avenue, this has not yet been initiated. These studies by the City must be at least partially complete and publically available prior to being analyzed for their impacts with respect to the VAMC and surrounding area. VA can only analyze projects that are reasonably foreseeable in the near future, and for which there is a suitable amount of information available.

The impact of construction of the UMC was explored in the *Site-Specific Environmental Assessment for Design, Construction, and Operation of the University Medical Center* (FEMA 2010). Cumulative impacts associated with the combined construction of the replacement VAMC and new UMC were evaluated in the FEMA 2010 SEA and additionally in VA's Design SEA. Drainage issues associated with the construction of both campus' were evaluated both of these documents. The State has repeatedly and publically expressed the intention of completing the UMC on the designated site within the next three to four years, therefore at this point it is not reasonably foreseeable that the site would remain vacant for a significant amount of time.

Land Use

Approximately 14 % of comments addressed the cumulative impacts analysis including:

- Not consistent with UNOP. UNOP proposed the replacement VAMC and UMC both be placed on the UMC side of the Tulane/Gravier site.
- Discussion of the Master Plan is insufficient and misleading. The proposed replacement VAMC and UMC sites were not evaluated in the Master Plan.
- Concern that City will not have a use for or not be able to revitalize the property through lack of resources or financial support and therefore the property will remain closed. Concerned about the lack of framework and schedule for reutilization and revitalization of this area of the CBD.
- Land use statistics presented in the SEA comes from a 1999 source. Land use has changed dramatically since that time. Residential land use in the CBD is growing with new developments.

RESPONSE:

While the UNOP plan was discussed in this SEA, this plan is a recommendation that was followed up on and expanded upon by the New Orleans Master Plan which holds the force of law. When discussing the consistency of the analysis in this SEA with either

UNOP or the Master Plan, the analysis in this SEA addresses the portions of UNOP and the Master Plan which address re-use of the existing VAMC Perdido campus. Analysis of UNOP and the Master Plan in conjunction with site selection, design, construction, and operations of the replacement VAMC were analyzed in the PEA and Design SEA and are not applicable to this SEA.

The analysis included in this Disposition SEA is focused on the existing Perdido campus. The existing Perdido campus is included in the New Orleans Master Plan and the zoning and discussion related to the Perdido site is included in the Land Use section of this Disposition SEA.

Transfer of the existing VAMC to the City of New Orleans gives the City the greatest flexibility in potential re-use options which would be consistent with the new Master Plan. The City has acknowledged the need to return the property to an active state and has expressed interest in receiving the property. It is anticipated that once the City gains full control of the site they will work toward revitalization of the site in some manner consistent with the City's best interests and in conjunction with the City's new Master Plan.

Section 3.2 Land Use has been reviewed and has been updated.

Human Health and Safety

Approximately 8 % of comments addressed human health and safety concerns related potential re-use of the site.

- A number of tests were not conducted that may impacts the disposition of the property, for example testing the water well and neutralization basin for contamination. Why were these tests not conducted?
- The medical waste existing conditions section (Section 3.4.1.3) makes it appear that medical waste is a problem for the facility but the language is non-specific and not tied to any concrete data related to the building in question. This has the potential to be misleading.

RESPONSE:

Neither the water well nor the neutralization basin are currently in use. The neutralization basin was in good working order prior to Hurricane Katrina and there is no reason to believe there is any contamination related to this basin. Based on the potential future re-use of the facility it may be necessary to test the integrity of the basin or remove the basin at which point sampling may also be considered. The water well has not been used in over 20 years and is not intended for future re-use. Groundwater in New Orleans is not used for potable purposes. Testing of the groundwater would be recommended should a possible future re-use of the well be determined.

Section 3.4.1.3 Medical Waste has been updated and more detailed information regarding types and amounts of medical waste currently produced at the VAMC Perdido campus has been included.

City Interest

Approximately 6 % of comments questioned whether the City of New Orleans wanted to receive the property, whether the City had any specific ideas for what it would do with the property should they receive it, and whether the City was willing to take on responsibility for cleaning up the property.

RESPONSE:

At the public meeting the City of New Orleans affirmed interest in receiving the property and that they would look at all feasible options for re-use and they recognize the need to bring the property back into active use. The City explained that they would work out any necessary cleanup details with VA prior to transfer.

General Comments

Approximately 6 % of comments focused on general editorial comments

COMMENT:

On page 1-8 the draft states that the SEA was prepared in coordination with “historic preservation groups” listed in a table. The NTHP did not coordinate in any way with the preparation of the Draft SEA.

RESPONSE:

The list on page 1-8 was intended to list organizations and agencies that have participated throughout the environmental and historic review process through Section 106 Consulting Parties meetings, NEPA public meetings, and submission of written comments on both Section 106 and NEPA processes. The explanation for this list has been clarified in the SEA.

COMMENT:

On page 1-1 the Draft SEA states that the VAMC experienced severe damage due to “extended submersion”. The draft should be revised to indicate the extent of submersion, the entire building was not in fact underwater at any point.

RESPONSE:

The paragraph in question has been clarified in the Draft SEA. The basement and subbasement of the entire VAMC campus and the first floor of Building # 2 (now demolished) and Quadrant G were submerged for an extended period of time following Hurricane Katrina.

COMMENT:

Section 4-6 paragraph 3 states that the historic structures, including Charity Hospital, are being secured and ventilated, and that these are monitored to ensure continued effectiveness. This is not true. Charity Hospital has been continuously vandalized for copper. Securing the building is required in the PA but the vandalism has occurred steadily over time. The State has not properly secured the building.

RESPONSE:

The State of Louisiana has reported in the November 2009 Interim Progress Report to the Advisory Council for Historic Preservation (ACHP) regarding the State's compliance with the PA, and has reaffirmed in the November 2010 Interim Progress Report to the ACHP that the State has completed secure and ventilation procedures and that these procedures are "monitored periodically to ensure their continued effectiveness."

MOU

Approximately 6 % of comments addressed the existing Memorandum of Understanding (MOU) between the City and VA. These comments were focused on the timing of the MOU, questioned when City was offered the property, and expressed concern that the MOU process was completed without public participation and was predetermined.

RESPONSE:

The potential for the exchange of the VAMC campus for the Tulane/Gravier site grew out of the City's offer of a parcel of land for the replacement VAMC, during VA's site evaluation and selection process. The City's offer was one of a few that were considered. Under the VA/City MOU there were three possible outcomes regarding disposition of the existing VAMC should VA accept City's site selection offer. All three of those outcomes are evaluated in this SEA. The process was not predetermined, all three were valid alternatives. Public hearings were an important part of the site selection process. The proposed action, transfer of the existing VAMC to the City in exchange for the Tulane/Gravier site best meets the needs of the VA and City and is not expected to have significant human health or environmental impacts.

NEPA Process

Approximately 4 % of comments dealt with the NEPA process in general or for the project specifically including whether the individual comments submitted would be made available on either the public website or the Consulting Parties website.

RESPONSE:

Copies of the meeting transcripts are provided on the project website as soon as they are available and are summarized in this Appendix of the SEA. Comments submitted in writing have been summarized in this Appendix of the SEA.

Site Selection for the Replacement VAMC

Approximately 4 % of comments focused on the site selection process for the replacement VAMC.

RESPONSE:

Because the site selection analysis was completed during the Tier I process which resulted in the PEA, site selection was not a factor for discussion in the SEA.

Mitigation Measures

Approximately 2 % of comments suggested that additional mitigation measures beyond those in the PA and other pre-existing documents should be developed to address any new findings or changes in circumstance. Without additional treatment measures the tiering arrangement avoids assessment of the actual, total, cumulative impacts.

RESPONSE:

The existing PA and MOA cover all anticipated adverse impacts, with respect to cultural resources, for all alternatives reviewed in this SEA in addition to the PEA, Building # 2 SEA, and Design SEA. Both the PA and the MOA have delineated mitigation measures which the VA, the Louisiana State Historic Preservation Office, the Advisory Council on Historic Preservation, and all other signatories to both agreement documents have agreed adequately mitigate the anticipated adverse effects to both the VAMC campus and the surrounding historic districts.

Should future re-use of the facility include potential impacts for any resource areas not adequately evaluated in these documents, the need for additional review would be evaluated at that time.

Support for the Preferred Alternative

Approximately 2 % of comments agreed that selection of the preferred alternative would reduce the uncertainty surrounding the site by transferring the property to the City at the earliest possible point, thus allowing the City to begin the process of determining potential reuse as soon as possible. The City appears to be the best situated party to bring the property back into commerce.

RESPONSE:

VA agrees that selection of the Preferred Alternative, Alternative # 1, provides the most control for the City of New Orleans to return the property to active use for the benefit of the City while allowing VA to focus its resources and financial support on the restoration of healthcare for Veterans in the area.